

Agent with the FBI. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, including my review of pertinent documents and interviews of witnesses. Because this Affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

3. I present this affidavit in support of a Criminal Complaint charging KULBIR KAUR and HARMANPREET SINGH (individually, “KAUR” and “SINGH,” respectively, and collectively, “defendants”) with committing and aiding and abetting each other in committing the offense of Forced Labor, in violation of Title 18, United States Code, Sections 1589(a) and 2.

PROBABLE CAUSE

4. On September 21, 2021, a Virginia-based labor attorney contacted the FBI Richmond Field Office and advised he was representing a potential labor trafficking victim that had been exploited by a family member since February 2018. The attorney coordinated a meeting between the victim, hereinafter B.S., and FBI agents.

5. On October 7, 2021, FBI agents interviewed B.S., an Indian national, at the FBI Richmond Field Office. During this interview, B.S. reported being forced to work for his cousin, SINGH, and his cousin’s wife, KAUR, for approximately three years.

6. According to B.S., he was born and raised in the village of Khurdan, Punjab, in India. B.S. never worked while living in India but helped on the family farm. In or about 2017, when B.S. was in the 11th grade, he traveled to the United States on a school trip.

7. SINGH, B.S.’s cousin, was born and raised in India. After moving to the U.S. in or about February 2014, SINGH opened a gas station and convenience store named Lovely Market,

located at 11461 Robious Road in Richmond, Virginia, within the Eastern District of Virginia. At all times relevant to this criminal complaint, SINGH has been a resident of Chesterfield, Virginia, within the Eastern District of Virginia.

8. KAUR, SINGH's wife, was born and raised in India. After moving to the U.S. in or about December 2001, KAUR married SINGH in or about February 2014. KAUR worked with SINGH at the Lovely Market gas station. At all times relevant to this criminal complaint, KAUR has been a resident of Chesterfield, Virginia, within the Eastern District of Virginia.

Information from B.S.'s Interviews

9. During this investigation, B.S. has been interviewed by FBI agents on three different occasions. The facts set forth below are based on B.S.'s statements.

B.S.'s Background and Arrival in America

10. In February 2018, KAUR and SINGH traveled to India to attend a family reunion. B.S. attended the family gathering and talked to KAUR and SINGH about his desire to go to college in the United States or Canada and get a degree. B.S. explained he had a valid tourist visa from his recent school trip to the United States.¹ KAUR and SINGH recommended that B.S. travel to the United States with them, and they would assist him with getting enrolled in a school. B.S. talked to his parents about the opportunity. At the time, B.S.'s father was working overseas for the United States Department of Defense. B.S.'s parents were not happy with the idea of B.S. traveling to the United States because he was a minor. B.S.'s paternal aunt, R.K. and SINGH's mother contacted B.S.'s father and convinced him to allow B.S. to travel to the United States, saying that

¹ On February 3, 2017, the U.S. Government issued B.S. a B-1/B-2 nonimmigrant visa (NIV). A B-1/B-2 NIV, commonly known as a "visitor visa," permits individuals to enter the United States temporarily for purposes of tourism or brief business. Individuals who enter the United States on B-1/B-2 NIVs are not permitted to work while in the United States. An individual who remains in the United States past the expiration of his or her B-1/B-2 NIV remains in the United States in violation of law.

if B.S. did not find a school, he would return to India. B.S.'s father allowed B.S. to travel because R.K. was traveling with B.S. and would look after B.S.

11. SINGH purchased B.S.'s plane ticket using Cheapoair, an online travel service, and B.S.'s father paid SINGH for the plane ticket in cash. B.S. took his mother's debit card (for school expenses), \$300 USD cash, a phone that only connected to Wi-Fi, and a suitcase with his clothes for his trip. Because B.S. was a minor, B.S.'s parents prepared a document authorizing B.S. to travel to the United States with R.K.

12. On February 28, 2018, SINGH, KAUR, and R.K. took B.S. to the airport with them, and they all traveled from New Delhi, India, to Dulles International Airport, within the Eastern District of Virginia. Prior to traveling, KAUR and SINGH instructed B.S. not to disclose to United States Customs and Border Protection that he would be living with them, because, as they related, B.S. was not supposed to be living in a permanent location with a tourist visa. Immediately after passing through customs screening and while still inside the airport, KAUR told B.S. she needed his passport because he was a minor and that she would secure it in her safe. That would be the last time B.S. had his passport until May 2021, when he escaped from KAUR and SINGH.

Physical Abuse and Forced Labor

13. When B.S. first arrived in the United States, KAUR and SINGH resided at a single family home in Richmond, Virginia (hereinafter ADDRESS 1). When B.S. arrived at ADDRESS 1, KAUR and SINGH had a room ready for him. The day following his arrival, at around 6:00 a.m., SINGH came into B.S.'s bedroom and told B.S. to get ready to work. B.S. told SINGH he thought he would be searching for schools, not going to work. Despite B.S. insisting that his parents would pay for any school costs, SINGH told B.S. that he would need money for school fees. At the time, B.S. had never worked before, did not understand United States currency or college costs, and felt

he did not have another option but to go to work with SINGH that morning. B.S. thus began working at the Lovely Market, a gas station and convenience store owned by SINGH, in or about March 2018. B.S. would continue to work there through in or about May 2021.

14. Once at the Lovely Market the first morning, SINGH explained the store's operations to include cashier management, gambling machines, kitchen operation, and various cigarette brands. In the beginning, SINGH stayed with B.S. all day at the Lovely Market until closing, but eventually, SINGH began leaving B.S. to operate the store alone. B.S. worked at the Lovely Market seven days a week, from 7:00AM to 10:00PM.

15. Eventually, several of the customers of the Lovely Market questioned B.S. about the work schedule and B.S.'s young age. When SINGH found out the customers were noticing B.S.'s prolonged presence at the Lovely Market, SINGH talked to KAUR about avoiding unwanted scrutiny. KAUR thereafter instructed SINGH to work the counter of the Lovely Market from 7:00AM to 11:00 AM, and B.S. to work from 11:00 AM to 10:00 PM. Although B.S. began his shift at 11:00 AM, SINGH made B.S. travel to the Lovely Market with SINGH at 7:00 AM and wait in the store until B.S.'s 11:00 AM shift began. B.S. would rest on the mattress located in the store's back room before his shift. Once B.S.'s shift was over at 10:00 PM, he closed the store. SINGH would transport B.S. back to ADDRESS 1, where B.S. would eat dinner prepared by KAUR and sleep.

16. B.S. noted that while he was a minor, KAUR and SINGH sent money to B.S.'s parents via Western Union. KAUR and SINGH made several Western Union money transfers to B.S.'s mother's bank account, the account associated with the debit card that B.S.'s mother had provided to B.S. when B.S. traveled to the United States. Once B.S. turned 18 years old, KAUR and SINGH stopped transferring money to B.S.'s mother's account.

17. In January 2020, KAUR and SINGH traveled to India and did not return until July 2020. During this time, B.S. lived with a friend of SINGH and K.K's, R.P., in a residence in North Chesterfield, Virginia. B.S. worked approximately thirteen hours every day at the Lovely Market between January 2020 and July 2020.

18. Between March 2018 through May 2021, B.S. confronted KAUR and SINGH on several occasions about not being enrolled in school as agreed upon and being forced to work at the Lovely Market. KAUR and SINGH responded to these confrontations by physically assaulting and threatening B.S. to compel him to continue to work at the Lovely Market.

19. In January 2019, B.S. again voiced his concern to KAUR and SINGH about working seven days a week, not being allowed to go anywhere, and that his passport was expiring soon. During this confrontation, KAUR and SINGH physically assaulted B.S. by pulling B.S. by the hair, which caused B.S. to cry. KAUR and SINGH later went to the room and apologized. However, B.S. continued to work at the Lovely Market thereafter.

20. In January 2021, SINGH traveled to India for approximately six months while KAUR stayed in the United States. B.S. worked every day at the Lovely Market for approximately 16 hours a day. At some point, B.S. got sick and was not able to go to work. After KAUR told SINGH that B.S. did not want to work, SINGH threatened B.S. over the phone. When SINGH returned from India, SINGH pushed B.S. to the floor and threatened B.S. with a silver revolver. SINGH told B.S. that he would kill B.S. if he did not work and that no one would find out.

21. B.S. saved approximately \$1,000 USD from tips he collected at the Lovely Market. In mid-2019, KAUR and SINGH went in B.S.'s bedroom and took that money, accusing B.S. of stealing money from the store. Only when KAUR and SINGH were traveling was B.S. allowed to take money from the register to purchase groceries to feed himself. B.S. complained to some of

the Lovely Market clients about not being able to keep tips.

Immigration Documents, Forced Marriage, and Continued Physical Abuse

22. Between March 2018 and May 2021, B.S. requested that KAUR and SINGH return his passport to him on at least eight different occasions. The first time was at the Lovely Market approximately three weeks after B.S. had arrived in the United States. B.S. requested his passport from SINGH in order to leave the United States and return to India because SINGH was not helping B.S. look for school opportunities. At this point, SINGH became upset and kicked B.S. When they returned to ADDRESS 1 from the Lovely Market, B.S. complained to R.K. about the altercation with SINGH and the fact he was not being enrolled in school. R.K. confronted SINGH about the altercation. When B.S. asked R.K., KAUR, and SINGH about his passport, KAUR told him it was secure in a bank locker.

23. In or about July 2018, when B.S.'s tourist visa was about to expire, B.S. again requested his passport in order to return to India. KAUR and SINGH dismissed B.S.'s request by telling him the new school semester would begin in September. In or about January 2019, he again requested his passport in order to return to India, knowing the passport would soon expire and would become invalid. KAUR and SINGH told him not to worry because they would apply for asylum in order to keep B.S. in the United States. B.S. did not believe that he was in any danger in his hometown in India, but, at some point, KAUR took B.S. to an immigration attorney and told B.S. to lie to seek asylum in the United States. Thereafter, B.S. requested for a fourth time that KAUR and SINGH return his passport. By this point, B.S. understood that his passport and visa had expired; KAUR and SINGH used the expiration of those immigration documents to threaten B.S. regarding his illegal immigration status, stating that B.S. would go to prison if law enforcement discovered him. Not being familiar with United States immigration laws, B.S. took

SINGH's and KAUR's threats seriously.

24. In August 2019, B.S. again asked SINGH to return his passport. At this point, he was physically assaulted by SINGH. Later that day, SINGH told B.S. he had divorced KAUR, and that B.S. would now marry KAUR; SINGH reiterated that KAUR would help B.S. enroll in school. B.S. objected, explaining that he did not want to marry KAUR because she was much older than him. SINGH threatened B.S., telling him he would marry KAUR or SINGH would physically assault B.S. again. A few days later, an officiant married B.S. and KAUR at ADDRESS 1. Shortly after their marriage, KAUR requested B.S.'s birth certificate, elementary school certificate, and copies of B.S.'s parent's property titles from B.S.'s family in India, under the pretext that such documents were needed to enroll B.S. in school. After B.S.'s family sent the documents requested, KAUR told B.S. that he could not be enrolled in school. KAUR thereafter used the documents provided by B.S.'s family to repeatedly threaten B.S. by telling B.S. that if he ran away, she would take his parents' property because they were now married.

25. In July 2020, after SINGH returned from India, and again in December 2020, prior to SINGH returning to India, B.S. asked KAUR and SINGH to return his passport (both times to no avail). It was not until in or about May 2021, as further described below, that B.S. successfully confronted KAUR and SINGH, threatening to call 911 if they continued to withhold that document. Only then, did KAUR and SINGH return B.S.'s expired passport to him.

Living Conditions, Control, and Isolation

26. During his time working at the Lovely Market, B.S. was isolated from other people and constantly monitored by KAUR and SINGH. B.S. did not meet any of the neighbors of ADDRESS 1; nor was he invited to any of their gatherings. B.S. regularly interacted with several regular clients of the Lovely Market; however, SINGH instructed B.S. not to talk to people at the

store because someone could file a complaint that he was illegally in the United States. SINGH also told B.S. that he (B.S.) could go to jail for the rest of his life for the immigration violations (that is, being present in the United States on an expired passport and visa). B.S. was also instructed not to tell customers his full name or his age, and was instead instructed he could provide only his last name to customers. B.S. understood that SINGH had placed recording equipment throughout the Lovely Market and monitored B.S.'s interactions with customers.

27. In February 2021, KAUR and SINGH confronted B.S. about B.S.'s telling certain customers that he was not allowed to keep tips. SINGH specifically mentioned a text message communication B.S. had with a regular customer at the market about not being allowed to keep tips. At that point, B.S. realized that KAUR and SINGH were accessing his laptop. When B.S. changed the password for his laptop, SINGH slapped B.S. and forced him to provide the new password. SINGH also confronted B.S. about his aforementioned text message conversation with the Lovely Market customer, and made B.S. show SINGH the conversations.

28. B.S. was forced to spend multiple nights at the Lovely Market, staying in a small room in the back of the store that contained a mattress. On one such occasion, KAUR and SINGH traveled to New York for a week, and B.S. stayed at the Lovely Market, without access to a shower and required to feed himself by eating food from the store shelves. KAUR and SINGH also monitored B.S.'s phone and computer activity by syncing B.S.'s iPhone to KAUR's Apple computer and by taking B.S.'s phone at night. B.S. did not have a cell phone plan and could only use the phone when connected to Wi-fi at ADDRESS 1. KAUR and SINGH would only activate a cell phone plan when they were traveling. B.S. spoke to his parents regularly but was afraid to disclose the abuse because KAUR and SINGH monitored his activity.

29. KAUR controlled B.S.'s access to food and what he ate. KAUR would leave food

for B.S. in the kitchen for B.S. to eat when he returned home after closing the store. However, KAUR would often make different food for B.S. On one occasion, B.S. took food from the refrigerator. The following day, KAUR confronted B.S., claiming that he had eaten KAUR's daughter's food. Around the time B.S. turned 18 years old, KAUR and SINGH installed cameras in the kitchen area and tied a rope around the pantry door limiting his access to nuts, dried fruits, chips, or other snacks. Prior to this, B.S. had access to the pantry. B.S. took the cameras in the kitchen and the rope around the pantry door as a message that he was not allowed to take food from the kitchen that had not been left out for him.

30. B.S. never received medical treatment during the three years he spent working at the Lovely Market, despite multiple incidences wherein B.S. requested such medical care. On one occasion, B.S. was suffering from a severe toothache; rather than take B.S. to a dentist, however, the defendants instead only provided pain medication that had been previously prescribed to SINGH (but which SINGH had not fully consumed). On a separate occasion, B.S. burned his hand while frying chicken at the Lovely Market. KAUR and SINGH again refused to transport B.S. to receive medical treatment, instead providing only pain medication. KAUR and SINGH required B.S. to work at the Lovely Market even when B.S. was sick; they permitted B.S. only to take over the counter medicine from the Lovely Market shelves.

31. B.S. only resided at ADDRESS 1 and the R.P. residence. In or about May 2021, SINGH, KAUR, and their children moved to a new residence in North Chesterfield, Virginia (hereinafter ADDRESS 2). B.S. never resided at ADDRESS 2. B.S. resided at the R.P. residence on three occasions: (1) from January 2020 through July 2020, when KAUR and SINGH traveled to India; (2) in January 2021, when SINGH traveled to India; and (3) after KAUR and SINGH moved to ADDRESS 2. B.S. was advised against disclosing any type of abuse to R.P. under the threat that

KAUR would take B.S.'s family property in India (since she was his legal wife).

Immediate Outcry and B.S. Escape

32. In May 2021, B.S. was talking to an online friend (later identified as K.S.) via FaceTime. K.S. noticed red markings on B.S.'s face. K.S. asked B.S. about the red marking and convinced B.S. to talk to her about the abuse. K.S. explained to B.S. that the abuse by KAUR and SINGH was illegal and they could not do that in the United States. KAUR and SINGH learned about B.S.'s conversations with K.S. and confronted B.S. K.S. contacted the National Human Trafficking Hotline to report the matter.

33. On or about May 20, 2021, SINGH confronted B.S. because B.S. wanted to go back to India. SINGH pulled out his silver revolver and threatened B.S. At this point, B.S. became very upset and told SINGH to kill him because he was done with his life. SINGH tried to calm him, but B.S. warned he would call 911. SINGH told KAUR what happened, and she told B.S. again that as his wife she could take his family's properties in India. B.S. called his father and advised him what had happened. B.S.'s father was very upset because he was not aware that B.S. had not gone to school over the past three years.

34. B.S. continued to request his passport. KAUR threatened to call the police and tell them that her husband (that is, B.S.) attacked her before he left the house. B.S. was not deterred and continued to request the return of his passport. KAUR and SINGH told him that the passport was in a bank safe, and the bank did not open until Monday. During this time, B.S. did not return to the Lovely Market and instead stayed at the R.P. residence.

35. While B.S. was out of the R.P. residence, SINGH collected B.S.'s belongings, to include his laptop and personal diary. SINGH had previously taken B.S.'s phone.

36. On May 24, 2021, SINGH returned B.S.'s expired passport and certificates.

SINGH did not return the other personal items he collected from the R.P. residence. B.S.'s father coordinated for B.S. to move in with a relative in another state.

Search Warrant of ADDRESS 2 and the Lovely Market

37. On December 14, 2021, FBI Agents executed a federal search warrant at ADDRESS 2 and the Lovely Market simultaneously. During the execution of the search warrant, KAUR and SINGH were interviewed by FBI agents. Your affiant summarizes those interviews below.

Interview of KAUR

38. KAUR told investigators that the house where FBI Agents were executing the search warrant (ADDRESS 2) belonged to SINGH, KAUR's ex-husband. KAUR claimed that SINGH was protecting her from B.S..

39. During her interview, KAUR also stated that:

- a.* B.S. came to the United States in 2018 with SINGH's mother, and that SINGH's mother had a letter which granted her custody of B.S. since he was a minor.
- b.* KAUR believed B.S. came to the United States only to visit sites as a tourist and she (KAUR) was not aware that B.S. wanted to go to school. KAUR claimed she was not aware if B.S. was working or volunteering at the Lovely Market. KAUR claimed that SINGH had never told KAUR that B.S. worked at Lovely Market, and that she only later learned this fact from B.S. himself.
- c.* KAUR finalized her divorce with SINGH in February 2019 and married B.S. in August 2019. After this, KAUR stated, she and B.S. lived with KAUR's children at ADDRESS 1. KAUR claimed that at this time, SINGH did not have an employee at the Lovely Market so he spent a lot of time at the gas station and

would sleep sometimes at ADDRESS 1. KAUR claimed that SINGH was initially unaware of B.S. and KAUR's marriage and was very upset when he found out.

- d.* KAUR stated that she found B.S.'s diary (which contained his passwords) and thereafter used her laptop, a silver Macbook, to access B.S.'s Facebook account. KAUR found out that B.S. had a girlfriend and had confronted B.S. KAUR claimed that she divorced B.S. in February 2021, and that B.S. had inappropriately touched her 17-year-old daughter and would call KAUR constantly and threaten her. KAUR also claimed that B.S. had slapped KAUR a few times.
- e.* KAUR claimed that B.S. only wanted to get documents to stay legally in the United States.

Interview of SINGH

40. In his interview, SINGH admitted to having owned Lovely Market since 2017 but denied that B.S. had any involvement with the Lovely Market. SINGH repeatedly stated that B.S. had never worked at Lovely Market. Later, though, SINGH revised his account to say that B.S. sometimes came to the store with SINGH for a couple of hours. SINGH told law enforcement that a relative or another employee would take care of the Lovely Market during SINGH's trips to India, not B.S.

- 41. SINGH also stated that:
 - a.* B.S. used to live with him, and that B.S. did not have a vehicle or driver's license.
 - b.* B.S. never slept at the store, and the mattress in the back room was instead for SINGH's use;

- c. SINGH did send money to B.S.'s family, but the money was unrelated to B.S.'s employment;
- d. The only reason for B.S.'s travel to the United States was to visit, and for no other reason;
- e. B.S. never attended school while in the United States, nor told SINGH that he wanted to leave;
- f. SINGH never saw B.S.'s passport and did not know if KAUR had the passport, but that SINGH had encouraged B.S. to return to India after his visa expired; and
- g. SINGH separated from KAUR in late 2017 and divorced her in 2018, after which KAUR married B.S. in 2019. SINGH related that during the divorce process, KAUR resided with her brother, but that KAUR moved back with SINGH when SINGH purchased the new residence (ADDRESS 2) in approximately March 2021.

42. SINGH stated that he had a revolver at ADDRESS 2. He described the revolver as a .38, and explained that he kept it in a drawer. SINGH stated that B.S. did not leave any belongings at ADDRESS 2 when he left. SINGH stated that he kept a computer B.S. used because it belonged to SINGH.

Items Collected and Evidence Review

43. During the execution of the search warrant, multiple evidence items were collected at ADDRESS 2 and the Lovely Market, including a Ruger SP101 silver revolver, business documents, and several electronic devices. The electronic devices collected were reviewed by FBI agents. Below is summary of some of the pertinent findings:

- a. Apple iPhone collected from SINGH at the Lovely Market

- i. The device contains multiple images from surveillance cameras inside the Lovely Market. The images depict B.S. and SINGH working at the Lovely Market. B.S. is seen at times working the cash register. The images have varied creation dates in the month of March 2021.
 - ii. The device contains videos of a Facebook messenger conversation between a Facebook account known to belong to B.S. and another individual, later identified as a customer of the Lovely Market. During the conversation, B.S. disclosed to the customer that he had left working at the Lovely Market because SINGH had not paid him in two years and was treating him as a slave. B.S. also disclosed that KAUR and SINGH were not letting him study.
 - iii. The device contains multiple videos of SINGH shooting different weapons, to include a shotgun, a long gun, and a silver revolver. One video depicts a close-up of that silver revolver, which appears to be a Ruger SP101 .357 Magnum.
- b. Apple iPhone collected from KAUR at ADDRESS 2
- i. The device contains approximately 20,500 still shots of surveillance cameras inside the Lovely Market dated between January 5, 2021, and May 21, 2021. A large number of the images depict B.S. working in the Lovely Market. SINGH is also seen in some of the images working at the Lovely Market.
 - ii. The device contains approximately 60 surveillance videos taken from inside the Lovely Market. The videos depict B.S. and SINGH working at the Lovely Market. The videos were created between January and February of 2021.
 - iii. The device contains a Facebook messenger conversation between a Facebook account known to belong to B.S. and another individual, identified as a customer of

the Lovely Market. During the conversation, B.S. disclosed to the client that he had left because SINGH had not paid him in two years and was treating him as a slave. B.S. also disclosed that KAUR and SINGH were not letting him study. (These images were also found in SINGH's phone.).

- iv. The device contains a picture of B.S.'s passport, expiration date February 3, 2019.
- v. The device contains multiple pictures of B.S.'s Facebook profile picture.
- vi. The device contains multiple videos of SINGH shooting different weapons, to include a shotgun, a long gun, and a silver revolver. (These videos were also found in SINGH's phone.).
- vii. **Surveillance Video from Inside Lovely Market Dated February 20, 2021:** An audio and video recording taken from inside the Lovely Market on February 20, 2021, found on KAUR's phone appears to depict an argument between B.S. and SINGH. The video begins with what appears to be SINGH confronting B.S. and showing B.S. his phone. B.S. appears to apologize and attempts to take something away from SINGH before hugging him.
 - 1. B.S. was shown this video during an interview with FBI agents and provided the following information: B.S. recalled that confrontation and explained that SINGH was confronting him because he was upset that B.S. told a client from the Lovely Market not to give him tips because B.S. could not keep them. During the argument, SINGH told B.S. that he had betrayed him and pulled out a handgun. SINGH began loading the gun. B.S. attempted to take the gun away from SINGH but was unsuccessful. SINGH threatened to shoot B.S. and his family before committing suicide. SINGH told B.S. that taking money from tips

was like taking money directly from SINGH and instructed him not to place tips in his pocket anymore in the future.

2. A review of the audio by the FBI's Language Unit indicated they were speaking in Punjabi and corroborated that the conversation between SINGH and B.S. was about a tip that B.S. received from a client. SINGH tells B.S. that even though the kids love B.S., he cheated on the kid's money. When SINGH appears to be grabbing something, B.S. grabs SINGH and tells him not to do that. SINGH then tells B.S. to stop or the gun will activate because it has rounds inside. B.S. then apologizes and says he will try to improve.

Record Checks

44. During the investigation your affiant has conducted records checks pertaining to KAUR and SINGH. ADDRESS 1 is listed as KAUR's residence. ADDRESS 2 is listed as SINGH's residence. KAUR and SINGH reported earnings in 2023 from ARMAAN VA CORP. ARMAAN VA CORP has a listed trade name of Lovely Market.

45. FBI Agents also obtained records from the Virginia State Corporation Commission. Those records reflect that SINGH is listed as officer, director, and president of the Lovely Market (since May 2017).

Visa Application and Continued Presence

46. During the course of the investigation, FBI agents provided supporting documentation to B.S.'s immigration attorney. FBI agents assisted B.S. in submitting a continued presence application. On May 2022, FBI Richmond received letters and documents from U.S. Citizenship and Immigration Services for B.S., including an Employment Authorization Card, Social Security Number and an I-797. These documents were subsequently released to B.S.

Witness Interviews

47. During the course of the investigation, investigators have conducted multiple witness interviews. A summary of some of the interviews conducted can be found below.

A. K.S.

48. K.S. has known B.S. since they were both in school in India. K.S. relocated to the United States in 2016 with her family. After B.S. relocated to the United States, K.S. and B.S. would communicate electronically several times a week. In 2020, they began communicating almost daily electronically and via FaceTime video calls.

49. K.S. observed many red flags during her conversations with B.S., for example: (1) B.S. was always at work when they communicated and never had a day off; (2) B.S. lied to her about attending school; and (3) after three years in the United States, B.S. didn't know any restaurants or stores to purchase undergarments.

50. K.S. wanted to call 911 because she knew something was wrong. B.S. begged her not to call because he was illegal in the United States and he was forced to marry "Lovely" (known to agents to be KAUR) and could get in trouble. When B.S. told her that KAUR and SINGH took his passport, K.S. believed B.S. to be a victim of human trafficking and contacted the National Human Trafficking hotline via text messages. K.S. did not know how to proceed further, however, since B.S. was afraid to interact with law enforcement.

51. K.S. decided to talk to her parents about the situation without disclosing B.S.'s identity. K.S. contacted B.S.'s family and disclosed B.S.'s situation.

B. A.S. (B.S.'s father)

52. On November 16, 2022, A.S., B.S.'s father, was interviewed telephonically by FBI agents with the assistance of an FBI Linguist. A.S. currently resides in India. A.S. corroborated

the information obtained from B.S. about his travel to the United States in February 2018.

53. Approximately one week after B.S. arrived in the United States, B.S. told his mother he was working. That was the first time A.S. knew about B.S. working and that KAUR and SINGH owned a store in the United States. When A.S. found out B.S. was not attending school, he called R.K., who shortly afterwards told A.S. that B.S. had started school. Approximately two days after A.S.'s conversation with R.K., B.S. told his parents he was attending school and working. A.S. was under the impression that B.S. was studying and working part-time at the store to pay for his studies.

54. During B.S.'s first year in the United States, while B.S. was still a minor, A.S. received money from SINGH. SINGH told A.S. that the funds consisted of the amount left after paying B.S.'s monthly school fees. A.S. told B.S. he did not have to work because A.S. had money to pay for B.S.'s school fees. After B.S. became an adult, A.S. asked SINGH about B.S.'s passport, and SINGH told A.S. not to worry because they were in the process of getting B.S. a new passport and visa. At that time, B.S. reached out to A.S. and asked for property and land documents. A.S. asked SINGH about the request for documents, and SINGH told A.S. that they were for B.S.'s college enrollment.

55. B.S.'s friend K.S. told A.S. about the abuse. When A.S. first heard about this from K.S. he could not believe it. B.S. only disclosed to A.S. the physical abuse he had endured from KAUR and SINGH, and the forced marriage to KAUR, in May 2021, after a confrontation with SINGH. A.S. could not understand how for three years, B.S. did not attend school and was forced to work. A.S. explained that B.S.'s mother had been so impacted by the news that she had a stroke and was hospitalized.

C. Court Officiant

56. On August 23, 2022, the Court Officiant (hereinafter “Officiant”) who had officiated the wedding between B.S. and KAUR was interviewed by FBI agents. After reviewing the marriage certificate and register provided by agents, Officiant recalled the marriage because the groom was 20 years younger than the bride. Officiant visited ADDRESS 1, which he described as a townhome in Chesterfield. Officiant was aware KAUR had three children at the time but did not see them during the ceremony. KAUR told Officiant she was a nurse who worked night shifts and B.S. would take care of the children while she worked. Officiant recalled KAUR contacted him and paid for the wedding. B.S. did not speak during this interaction, so Officiant believed this was an arranged marriage where the groom had just arrived in the United States and did not speak English. Officiant did not see any family photos at the residence.

D. Lovely Market Customers

57. During the investigation, several Lovely Market customers were identified and interviewed. The customers interviewed identified SINGH as the owner of the Lovely Market. The customers also identified B.S. (although only one customer knew B.S.’s real name; the other customers called him different names). All the customers interviewed recall seeing B.S. work at the Lovely Market. Consistent with B.S.’s account, three customers recall seeing B.S. working long hours, being very busy, and at times being the only one working at the Lovely Market. Two customers recalled B.S. telling them he was not being paid for his work.

E. Lovely Market Vendors

58. Multiple Lovely Market vendors were interviewed during the investigation. The vendors interviewed worked for different companies that provided service to the Lovely Market, specifically the gaming machines and fried chicken. The different vendors indicated they visited

the store during the time that B.S. worked at the store. One vendor did not recognize B.S. and explained he dealt mostly with the owner, SINGH. Two vendors recalled B.S. and indicated that he was the one that ran the Lovely Market, and that B.S. had always been busy frying chicken, running the cash register, and attending vendors.


F. Former Lovely Market Employees

59. Two former Lovely Market employees were interviewed and corroborated that B.S. worked at the Lovely Market. The two former employees described that B.S. started his shift at the Lovely Market at around 10:00 or 11:00 a.m. and would stay until closing. The former employees both stated they did not interact much with B.S. because it was always very busy at the store.

CONCLUSION

60. Based on a review of this case and based on my knowledge and experience, I submit that there is probable cause to believe KULBIR KAUR and HARMANPREET SINGH have committed and aided and abetted one another in committing the crime of Forced Labor, in violation of 18 U.S.C. §§ 1589, 1594(a), and 2.

61. In consideration of the foregoing, I respectfully request that this Court issue a Criminal Complaint and Arrest Warrants for KULBIR KAUR and HARMANPREET SINGH.



David Gonzalez
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed this 19th day of May 2023.



Hon. Mark R. Colombell
U.S. Magistrate Judge